

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:

Cettie Smith

Debtor.

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: **Case No.: 23-10121**
: **Chapter 13**
: **Judge Jacqueline P. Cox**
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OBJECTION OF BEAL BANK USA TO THE CONFIRMATION OF THE PLAN
(DOCKET NUMBER 9)

Beal Bank USA ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed plan ("Plan") filed by Cettie Smith ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 7955 South Constance Avenue, Chicago, IL 60617 ("Property").
2. Creditor intends to file a Proof of Claim in the amount of \$16,352.76. This amount includes a pre-petition arrearage in the amount of \$8,387.03.
3. Debtors plan proposes in Part 3, Section 3.1 of the Plan that post-petition loan payments in the amount \$0.00 are to be paid. Payments are currently \$419.08 per month and that amount should be paid to Creditor.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/ Todd J. Ruchman

Todd J. Ruchman (6271827)

Adam B. Hall (0088234)

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The case attorney for this file is Todd J.
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CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Objection of Beal Bank USA to the Confirmation of the Original Plan was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Thomas H. Hooper, ecf@tvch13.net

David Freydin, Attorney for Cettie Smith, david.freydin@freydinlaw.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Cettie Smith, 7955 South Constance Ave, Chicago, IL 60617

Illinois Department of Healthcare, 401 S. Clinton, 5th Floor, Chicago, IL 60607

MGC Mortgage, Inc., 1 Corporate Drive, Suite 360, Lake Zurich, IL 60047

/s/ Todd J. Ruchman